

1 NATHAN SHAPIRO  
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7 Defendant in Proper Person

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **PAUL PONOMARENKO, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **PROJECT VEGAS MANSION, corporate**  
14 **entity of unknown form, NATHAN**  
15 **SHAPIRO, an individual; and DOES 1**  
16 **through 50,**

17 **Defendants.**

18 **NATHAN SHAPIRO, an individual,**

19 **Counterclaimant,**

20 **vs.**

21 **PAUL PONOMARENKO, an individual,**  
22 **DOES 1 through 50 and ROE business**  
23 **entities 51 through 100,**

24 **Counterdefendants.**

25 **NATHAN SHAPIRO, an individual,**

26 **Third Party Plaintiff,**

27 **vs.**

28 **SUMMIT ESTATE, INC. DBA SUMMIT**  
**ESTATE RECOVERY CENTER, a**  
**California corporation, DOES 1 through**  
**50 and ROE business entities 51 through**  
**100,**

**Third Party Defendants.**

**Case No.: 2:18-cv-00216-RFB-CWH**

**MOTION FOR OST PER LR IA 6-1 IN RE:**  
**MOTION FOR LEAVE OF COURT TO NAME**  
**ADDITIONAL PARTY AND TO ASSERT**  
**ADDITIONAL CAUSES OF ACTION**  
**PURSUANT TO FED.R.CIV.P. 15(a)(2) and**  
**19(a)(1)(A); MEMORANDUM OF POINTS**  
**AND AUTHORITIES IN SUPPORT THEREOF**

**FIRST REQUEST**



**DECLARATION OF NATHAN SHAPIRO PURSUANT TO 28 U.S.C. 1746 IN SUPPORT**  
**OF MOTION FOR ORDER SHORTENING TIME PURSUANT TO LR IA 6-1 IN RE:**  
**MOTION FOR LEAVE OF COURT TO NAME ADDITIONAL PARTY AND TO**  
**ASSERT ADDITIONAL CAUSES OF ACTION PURSUANT TO FED.R.CIV.P. 15(a)(2)**  
**and 19(a)(1)(A); MEMORANDUM OF POINTS AND AUTHORITIES**  
**IN SUPPORT THEREOF**

NATHAN SHAPIRO declares as follows:

1. I am an adult and am competent to make the following declaration and statements of fact of my own personal knowledge, except as to those statements made upon information and belief, and as to those matters, I believe them to be true.

2. On February 5, 2018, The Honorable United States District Judge Beth Labson Freeman of the Northern District of California entered an Order transferring the above-captioned litigation to the District of Nevada [ECF 88].

3. Contained in Judge Freeman's February 5, 2018 Order was the deadline for your declarant to file his amended counterclaim and amended third-party complaint by March 7, 2018.

4. In the event that the Motion for Leave of Court to Name Additional Party and to Assert Additional Causes of Action Pursuant to Fed.R.Civ.P. 15(a)(2) and 19(a)(1)(A); Memorandum of Points and Authorities [ECF 91] is heard in the ordinary course according to the Federal Rules of Civil Procedure, the adjudication thereof will of necessity be well past March 7, 2018.

5. Your declarant's proposed amended counterclaim and proposed amended third-party complaint are extremely meritorious, and in the interests of substantial justice should be adjudicated as part of this overall litigation.

6. Accordingly, an Order Shortening Time on the Motion for Leave of Court to Name Additional Party and to Assert Additional Causes of Action Pursuant to Fed.R.Civ.P. 15(a)(2) and 19(a)(1)(A); Memorandum of Points and Authorities [ECF 91] is warranted, just and proper under the totality of the circumstances, and is therefore respectfully requested.

7. That pursuant to the provisions of 28 U.S.C. 1746, I hereby declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct of my own personal knowledge, except as to those statements made upon information and belief, and as to those matters, I believe them to be true.

Executed this 21st day of February, 2018 at Las Vegas, Nevada.

/s/ Nathan Shapiro  
NATHAN SHAPIRO

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 21st day of February, 2018, I served a true and accurate copy of the foregoing through the Court's CM/ECF system, and via email, to the following parties:

SANJIV N. SINGH, ESQ.  
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Attorneys for Plaintiff

/s/ Nathan Shapiro  
NATHAN SHAPIRO